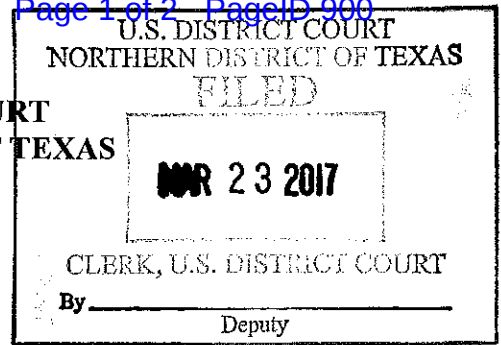


**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**



**SECURITIES AND EXCHANGE  
COMMISSION,**

**Applicant,**

**vs.**

**UPSTATE LAW GROUP, LLC, STRATEGIC  
MARKETING INNOVATORS, INC.,  
PERFORMANCE ARBITRAGE  
COMPANY, INC., AND FINANCIAL  
PRODUCTS DISTRIBUTORS, LLC,**

**Respondents.**

**Misc. Action No.: 4:17-mc-00009-A**

**ORDER**

On March 23, 2017, the Securities and Exchange Commission ("SEC") filed an Unopposed Motion to Enter Order As To Respondents Upstate Law Group, LLC ("ULG"), Strategic Marking Innovators, Inc. ("SMI"), and Performance Arbitrage Company, Inc. ("PAC"), stating that these three Respondents had agreed to comply fully with the SEC's administrative subpoenas directed to each of them, thereby resolving the relief sought by the SEC as to those three Respondents. The SEC asked the court to enter this Order, which grants the SEC all of the relief it requested as to each of them.

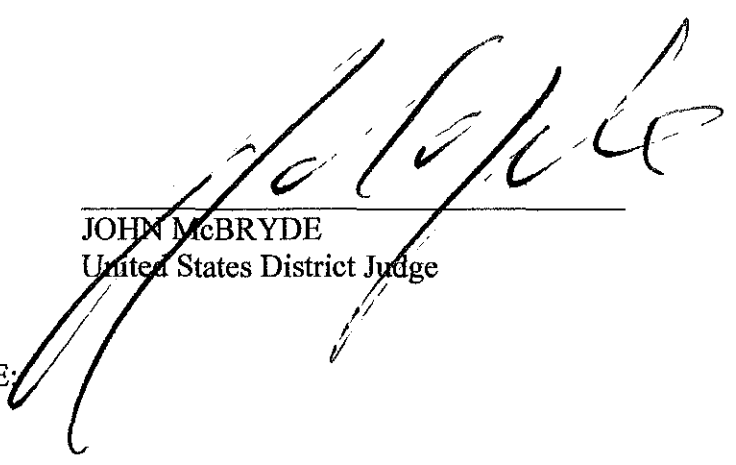
Therefore,

The court orders ULG, SMI, and PAC to deliver all documents, materials, and items requested for production by the SEC's October 26, 2016 administrative subpoena directed to each of them on or before 2:00 p.m. on April 5, 2017, at the United State Securities Exchange Commission, Fort Worth Regional Office, 801 Cherry Street, Suite 1900, Unit 18, Fort Worth,

**ORIGINAL**

Texas.

Signed March 23 2017.

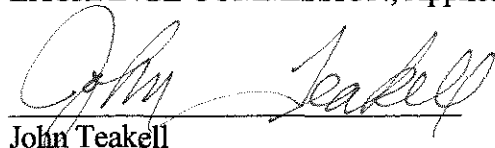
  
\_\_\_\_\_  
JOHN McBRYDE  
United States District Judge

AGREED AS TO FORM AND SUBSTANCE:



Janie L. Frank  
Texas Bar No. 07363050  
SECURITIES AND EXCHANGE COMMISSION  
Fort Worth Regional Office  
Burnett Plaza, Suite 1900  
801 Cherry Street, Unit #18  
Fort Worth, TX 76102-6882  
(817) 978-6478  
(817) 978-4927 (facsimile)  
Email: [frankj@sec.gov](mailto:frankj@sec.gov)

COUNSEL FOR PLAINTIFF SECURITIES AND  
EXCHANGE COMMISSION, Applicant



John Teakell  
Law Office of John Teakell  
2911 Turtle Creek Blvd., Suite 300  
Dallas, Texas 75219  
(214) 523-9076  
(214) 523-9077  
Email: [jteakell@teakelllaw.com](mailto:jteakell@teakelllaw.com)

COUNSEL FOR RESPONDENTS UPSTATE LAW GROUP,  
STRATEGIC MARKETING INNOVATORS, INC.,  
AND PERFORMANCE ARBITRAGE COMPANY, INC., Respondents